

EXHIBIT A

Samantha Wolff

From: Glos, Christopher D. <Christopher.Glos@KutakRock.com>
Sent: Tuesday, July 11, 2017 9:39 AM
To: Samantha Wolff
Subject: Spencer v. City of Palos Verdes - Local Rule 7-3/discovery

Hi Samantha.

Please recall that further to our June 5 discussions per Local Rule 7-3, the City/Chief withheld filing a summary judgment motion in response to plaintiffs requested additional discovery. We have since produced numerous ESI documents and I anticipate the last main group of responsive, non-privileged ESI will be served this week. We will also be producing any responsive, non-privileged text/chat messages from City Councilmember personal phones by the end of this week with the exception of information from Mr. Rea's phone. As you know, Mr. Rea is an attorney and expressed concerns about attorney-client privilege and/or work product that may be on his phone. We're working through those issues with Mr. Rea's law firm and I will get you any responsive, non-privileged materials as soon as possible. I will note that Mr. Rea informed me that he did not anticipate any responsive discovery on his phone. In addition, the PMQ depositions requested will be completed this week. We will continue to work with Plaintiffs to provide any proper additional discovery; however, as a courtesy, I wanted to let you know that we must proceed with filing our motion because of the fast approaching cut-off date.

Please let me know if you have any questions.

Thank you,
Chris

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